

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Bankruptcy Case No. 23-20273-GLT
Danielle Rae Bower,)	
Debtor,)	Chapter 13
)	
Danielle Rae Bower,)	
Movant,)	
v.)	
Rocket Mortgage, LLC, f/k/a Quicken)	
Loans, LLC; Internal Revenue Service;)	
And Ronda J. Winnecour, Chapter 13)	
Trustee;)	
Respondents.)	Document No.

NOTICE OF PROPOSED MODIFICATION TO PLAN DATED February 21, 2023

1. Pursuant to 11 U.S.C. § 1329, the Debtor(s) has filed an Amended Chapter 13 Plan dated November 11, 2024, which is annexed hereto at Exhibit "A" (the "Amended Chapter 13 Plan"). A summary of the modification is set forth below in paragraphs 4 through 6 of this Notice.

2. All Objections to the Amended Chapter 13 Plan must be filed and served by no later than 21 days after the date of this Notice upon the Debtor(s), Chapter 13 Trustee and any creditor whose claim allowance or treatment is the subject of the Objection. Untimely Objections will not be considered. Any creditor who files a timely Objection to the Amended Chapter 13 Plan must appear at the scheduled Initial Confirmation Hearing on the Amended Chapter 13 Plan.

3. A virtual (via Zoom) Initial Confirmation Hearing on the Amended Chapter 13 Plan will be held on **JANUARY 9, 2025**, at **11:00 A.M.**, before the Chapter 13 Trustee. The table and meeting I.D., to participate by Zoom (and telephone number and meeting I.D. to participate by telephone if you lack the ability to participate by Zoom), can be found at <http://www.ch13pitt.com/calendar/> several days before the meeting. Parties are expected to familiarize themselves with the Trustee's website at <http://www.ch13pitt.com/> and to comply with the procedures set forth at that site for conference participation.

4. Pursuant to the Amended Chapter 13 Plan, the Debtor(s) seeks to modify the Plan in the following particulars:

The Plan responds to the Notice of Mortgage Payment Change filed by Rocket Mortgage LLC on November 1, 2024. The Plan also removes the payment to the Internal Revenue Service and requests that any funds held on reserve to the Internal Revenue Service are used to pay General Unsecured Creditors.

5. The proposed modification to the Plan will impact the treatment of the claims of the following creditors, and in the following particulars:

The mortgage creditor (Rocket Mortgage, LLC) will be paid pursuant to the Notice of Mortgage Payment Change filed on November 1, 2024.

The Internal Revenue Service will no longer be paid under the Plan.

General Unsecured Creditors will be paid from the Funds on Reserve to the Internal Revenue Service.

6. Debtors submit that the reasons for the modification are as follows:

Rocket Mortgage, LLC filed a Notice of Mortgage Payment Change on November 1, 2024. This modification is necessary to respond to the Notice and ensure proper payments to this creditor.

Additionally, the Plan removes the payment to the Internal Revenue Service, who did not file a claim against the Debtor. Any funds on reserve to the Internal Revenue Service will be used to pay General Unsecured Creditors.

7. The Debtor(s) submits that the requested modification is being proposed in good faith, and not for any means prohibited by applicable law. The Debtor(s) further submits that the proposed modification complies with 11 U.S.C. §§ 1322(a), 1322(b), 1325(a) and 1329 and, except as set forth above, there are no other modifications sought by way of the Amended Chapter 13 Plan.

WHEREFORE, the Debtor(s) respectfully requests that the Court enter an Order confirming the Amended Chapter 13 Plan, and for such other relief the Court deems equitable and just.

RESPECTFULLY SUBMITTED, this 22nd day of November, 2024.

CALAIARO VALENCIK

BY: /s/ Donald R. Calaiaro

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